

ROCKY FLATS PLANT, P.O. BOX 464, GOLDEN, COLORADO 80402-0464 • (303) 966-7000

93-RF-3549

Attn: Paul V. Frank

RETURN OF CHARACTERIZATION AND TREATABILITY WASTES - SRK-105-93

Ref: P. V. Frank ltr (C2893-PVF-303) to K. C. London, Same Subject, March 3, 1993

My staff has reviewed NUS Laboratory's plan to composite Rocky Flats liquid wastes to facilitate shipment and storage. These wastes were generated during the characterization and treatability studies performed by HNUS on Rocky Flats Plant Solar Ponds sludge.

We understand that you:

- propose to composite the liquid wastes generated from these studies,
- ship the composited wastes to EG&G at Rocky Flats, and
- ship some solid material that did not fit in the prior shipment to EG&G Rocky Flats (We understand HNUS will retain the pondcrete and saltcrete samples for the upcoming treatability tests); and
- that you will proceed with discharge and/or disposal of rinse water and empty containers associated with the characterization and treatability studies and meeting your discharge and disposal requirements. We understand you will file relevant correspondence with your regulators on this matter.

We approve the four actions listed above. We will be able to receive and store the wastes as composited per your letter referenced above, and we approve the compositing in this context. Please note that we are not familiar with your laboratory's permits and do not, therefore, comment on whether the consolidation fits within your permitted operations (for example, we do not comment on whether neutralization would be considered treatment or would be approved within your permit).

Please provide us with the following:

- Documentation of a drum log for the consolidation. We anticipate this documentation will demonstrate that all RFP wastes have been accounted for in the compositing process, that the compositing scheme described in

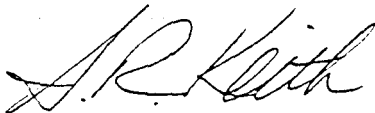
DOCUMENT CLASSIFICATION
REVIEW WAIVER PER
CLASSIFICATION OFFICE

referenced letter has been followed, and that the total volume of waste received by EG&G precludes the addition of any non-Rocky Flats materials. We understand, from your discussions with my staff, that there are no wastes from other DOE facilities in your labs at this time, so the chance of inadvertently co-mingling DOE Rocky Flats wastes with other DOE wastes does not exist.

- The results of any characterization, measurements, or calculations you perform for the composited wastes, which is likely to consist of pH and activity. We expect to proceed with the original plan to dispose of these wastes by including most of them on site processing.
- All information you have available on the contents and concentrations you have calculated or measured for the wastes that are not suitable for the Halliburton process (that is, the wastes containing halogenated solvents). These wastes will require other treatment.
- A written request for any documentation you may need as the generator of these wastes to close your files.
- Prior to arranging shipment, please provide us with a listing of the total number of drums to be shipped and the contents of each. This specific information is needed to plan storage for the containers.

We do not anticipate a need to send our inspectors to your site in support of the consolidation or shipment. NUS Laboratory is responsible to fulfill the packaging and shipper responsibilities for the transfer to Rocky Flats. Because we must have personnel ready to receive and store the wastes when they arrive, please coordinate directly with Vic Ament (303-966-2378) or his designee in our Traffic department on shipping matters. Also keep me informed of your progress and shipping plans since I must arrange storage for the shipment. Direction contained herein is not contractual modifications but rather technical coordination and guidance.

I appreciate your care in handling these materials, and look forward to satisfactory completion of the effort. If you have any questions, or need additional guidance please contact me on 966-8541.



S. R. Keith
Sludge Processing Project Manager
Solar Ponds Remediation
EG&G Rocky Flats, Inc.

KCL:apt



Environmental Laboratories
TWO MARQUIS OFFICE PLAZA, SUITE 200
5313 CAMPBELLS RUN ROAD
PITTSBURGH, PENNSYLVANIA 15205
(412) 747-2580 FAX (412) 747-2684

March 3, 1993

C-28-93-PVF-303

Ms. Kathy London
EG&G Rocky Flats, Inc.
P. O. Box 464
Golden, Colorado 80402-0464

Dear Ms. London:

The NUS Laboratory in Pittsburgh, Pennsylvania is prepared to begin consolidation of liquid wastes generated during the characterization and treatability analyses of Rocky Flats samples. We will follow the guidelines outlined in your February 8, 1993 telecopy to me. The compositing scheme is as follows:

- 207C-Pond and Clarifier material will be combined but segregated from the 207A-Pond, 207B-Ponds, Pondcrete, and Saltcrete.
- 207A-Pond and the 207B-Ponds will be combined but segregated from the other sources.
- Pondcrete and Saltcrete will be combined but segregated from the other sources.
- Wastes incompatible with the Halliburton processing on-site will be segregated. This includes only the halogenated solvents.
- The rinsewaters from the treatability project will remain segregated, and their disposition will be detailed in a future letter to you.

The liquids will be composited in a manner conducive to neutralization. The objective will be to raise the pH of the composited drum to ~5 by manipulation of the amount of each liquid added to it. If the pH of the composited drum is still not up to ~5, it will be adjusted upward with the addition of a base. The final pH of the composited drum will be recorded before it is sealed. This procedure will yield a product that should be amenable to the process engineering train.

Sincerely,

Paul V. Frank
Senior Project Manager

PVF/ckh

Copy: T. Bittner
J. Schmidt
J. Zak
R. Ninesteel

T. Snare
J. Simanic
S. Matthew